

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
At Chattanooga**

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 1:21-Cr-010-TRM-SKL

ANDREW CALHOUN,

Defendant.

UNOPPOSED MOTION TO CONTINUE SCHEDULED DATES

Defendant Andrew Calhoun, through undersigned counsel, respectfully requests this Honorable Court allow an additional fourteen (14) days on the scheduled deadlines in this case. The Pretrial Motions and Plea deadlines are currently scheduled for September 13, 2021; trial is set to begin October 4, 2021. Mr. Calhoun is free on bond and living in Sacramento, California, where undersigned has traveled to confer with him regarding this case.

The government will be sending a finalized Plea Agreement today and additional time is needed to discuss his options with Mr. Calhoun. In the event, Mr. Calhoun decides to proceed by plea agreement, undersigned will then coordinate the signing with Mr. Calhoun. Thus, this extra time is needed.

This motion is not made for the purpose of undue delay but to provide appropriate assistance of counsel to Mr. Calhoun. It would be in the interest of justice to grant this motion. Assistant United States Attorney James Brooks has been advised of this motion and does not object.

WHEREFORE, Mr. Calhoun respectfully requests this Honorable Court allow an additional fourteen (14) days on the currently scheduled dates in this case.

Respectfully submitted,

FEDERAL DEFENDER SERVICES
OF EASTERN TENNESSEE, INC.

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